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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION**

TECHNOLOGY PROPERTIES LIMITED)	Case Number: C 14-03640-CW
LLC and MCM PORTFOLIO LLC,)	
Plaintiffs,)	NOTICE OF SUPPLEMENTAL
vs.)	AUTHORITY IN SUPPORT OF
)	PLAINTIFFS' RESPONSE IN OPPOSITION
)	TO DEFENDANTS' MOTION FOR
)	JUDGMENT ON THE PLEADINGS
CANON, INC., et al.,)	
Defendant(s).)	Date: June 18, 2015
)	Time: 2:00 pm
)	Place: Courtroom 2 – 4 th Floor
)	Judge: Hon. Claudia Wilken

NOTICE OF SUPPLEMENTAL AUTHORITY IN
 SUPPORT OF PLAINTIFFS' RESPONSE IN
 OPPOSITION TO DEFENDANTS' MOTION
 FOR JUDGMENT ON THE PLEADINGS

C 14-03640-CW, C 14-03643-CW,
 C 14-03645-CW, C 14-03646-CW

1 TECHNOLOGY PROPERTIES LIMITED) Case Number: C 14-03643-CW
 2 LLC and MCM PORTFOLIO LLC,)
 3 Plaintiffs,) **NOTICE OF SUPPLEMENTAL AUTHORITY**
 4 vs.) **IN SUPPORT OF PLAINTIFFS' RESPONSE**
 5 HEWLETT-PACKARD COMPANY,) **IN OPPOSITION TO DEFENDANTS'**
 6 Defendant(s).) **MOTION FOR JUDGMENT ON THE**
 7) **PLEADINGS**
 8) Date: June 18, 2015
 9) Time: 2:00 pm
 10) Place: Courtroom 2 – 4th Floor
 11) Judge: Hon. Claudia Wilken

8 TECHNOLOGY PROPERTIES LIMITED) Case Number: C 14-03645-CW
 9 LLC and MCM PORTFOLIO LLC,)
 10 Plaintiffs,) **NOTICE OF SUPPLEMENTAL AUTHORITY**
 11 vs.) **IN SUPPORT OF PLAINTIFFS' RESPONSE**
 12 NEWEGG INC., et al.,) **IN OPPOSITION TO DEFENDANTS'**
 13 Defendant(s).) **MOTION FOR JUDGMENT ON THE**
 14) **PLEADINGS**
 15) Date: June 18, 2015
 16) Time: 2:00 pm
 17) Place: Courtroom 2 – 4th Floor
 18) Judge: Hon. Claudia Wilken

15 TECHNOLOGY PROPERTIES LIMITED) Case Number: C 14-03646-CW
 16 LLC and MCM PORTFOLIO LLC,)
 17 Plaintiffs,) **NOTICE OF SUPPLEMENTAL AUTHORITY**
 18 vs.) **IN SUPPORT OF PLAINTIFFS' RESPONSE**
 19 SEIKO EPSON CORPORATION, et al.,) **IN OPPOSITION TO DEFENDANTS'**
 20 Defendant(s).) **MOTION FOR JUDGMENT ON THE**
 21) **PLEADINGS**
 22) Date: June 18, 2015
 23) Time: 2:00 pm
 24) Place: Courtroom 2 – 4th Floor
 25) Judge: Hon. Claudia Wilken

PLAINTIFFS' NOTICE OF SUPPLEMENTAL AUTHORITY

Plaintiffs submit this Notice of Supplemental Authority in support of their response in opposition to Defendants' motion for judgment on the pleadings. *See* Plfs.' Resp. (Dkt. No. 311 in Case No. 4:14-cv-03640-CW; Dkt. No. 94 in Case No. 4:14-cv-03643-CW; Dkt. No. 79 in Case No. 4:14-cv-03645-CW; Dkt. No. 94 in Case No. 4:14-cv-03646-CW).

As Defendants noted in their motion, "[a] similar motion is pending in the N.D. Cal. San Jose division in another matter involving TPL.... *Tech. Prop. Ltd. LLC et al. v. Barnes & Noble, Inc.*, No. 12-cv-03863 (N.D. Cal. Feb. 4, 2015), ECF No. 48." Defs.' Br. at 5 n.2. The "Statement of Issue to be Decided" in Barnes & Noble, Inc.'s motion was the same as the issue presented by Defendants here. *Compare* Defs.' Br. at 5 with *TPL v. Barnes & Noble*, No. 12-cv-03863, ECF No. 48 at 2 ("Does the *Kessler* doctrine bar TPL's claims for infringement of the '336 Patent because the ITC has already found that Barnes & Noble's NOOK products do not infringe the patent, and TPL chose not to appeal that decision to the Federal Circuit?").

On May 31, 2015, Magistrate Judge Grewal issued a Report and Recommendation Denying Motion for Judgment on the Pleadings in the *TPL v. Barnes & Noble* case, a copy of which is attached as Exhibit A for the Court's convenience.

Dated: June 1, 2015

By: /s/Benjamin R. Askew (pro hac vice)
Attorney for Plaintiffs Technology Properties
Limited LLC and MCM Portfolio LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served on all counsel for all parties of record on June 1, 2015 via the Court's CM/ECF system.

/s/Benjamin R. Askew